

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DUSTIN HICE,
Plaintiff,
v.
DON LEMON,
Defendant.

19-CV-4666 (JMA) (SIL)

**DECLARATION OF
ERIC M. CREIZMAN**

I, ERIC M. CREIZMAN, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly admitted to practice law in the State of New York and before this Court. I am a partner of the law firm of Armstrong Teasdale LLP, and I joined that firm on February 10, 2020. Prior to joining Armstrong Teasdale, I was a partner of Pierce Bainbridge Beck Price & Hecht LLP, counsel of record for Defendant Don Lemon in the above-captioned action. I respectfully submit this declaration in support of my motion to withdraw as an attorney of record in this action pursuant to Local Rule 1.4.

2. On August 15, 2019, after the case was removed to this Court, I entered a notice of appearance in this action, along with other Pierce Bainbridge attorneys, including lead counsel Caroline Polisi and Christopher Lavigne. Since entering an appearance in the case, I have had no contact with Mr. Lemon at any time during the representation. I also did not, and do not have decision-making authority with respect to litigation strategy or filings. In addition, to the best of my recollection, I have never communicated with opposing counsel.

3. Ms. Polisi continues to serve as lead counsel in this case, and remains at Pierce Bainbridge. She is fully familiar with the facts and circumstances of the case, communicates with Mr. Lemon, with outside counsel, and has final decision-making authority with respect to the representation.

4. In these circumstances, Mr. Lemon would not be prejudiced by my withdrawal as an attorney of record in this action.

5. Because I do not have Mr. Lemon's contact information, this declaration will be served on Caroline Polisi by ECF and by email, and on all other counsel of record in this case by ECF.

6. Accordingly, I respectfully request that the Court grant my motion to withdraw as counsel and order the Clerk of Court to remove my name from the docket as counsel of record for Don Lemon in this case.

/s/ Eric M. Creizman
Eric M. Creizman